



January 10, 2022

**Via ECF Only**

Honorable James L. Cott  
U.S. District Court  
Southern District of New York  
500 Pearl Street, Room 1360  
New York, NY 10007

Re: *Jessica Israel v. Unum Life Insurance Company of America*,  
No. 1:21-cv-04335-GHW-JLC  
Proposed Summary Judgment Schedule

Dear Judge Cott,

The parties propose that the following schedule and page limits be adopted for motions for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.

- By March 15, 2022, Plaintiff will file her motion for summary judgment. The memorandum of law will be limited to 30 pages.
- By April 12, 2022, Defendant will file its motion for summary judgment and an opposition to Plaintiff's motion for summary judgment. The memoranda of law will be limited to a combined total of 45 pages.
- By May 10, 2022, Plaintiff will file a reply in support of her motion for summary judgment and an opposition to Defendant's motion for summary judgment. The memoranda of law will be limited to a combined total of 45 pages.
- By May 31, 2022, Defendant will file a reply in support of its motion for summary judgment. The memorandum of law will be limited to 30 pages.

Respectfully Submitted,

/s/Matthew Maddox

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